

QUIN DENVIR, Bar #49374  
Federal Defender  
DENNIS S. WAKS, Bar #142581  
Supervising Assistant Federal Defender  
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Attorney for Defendant  
CARRIE MARIE SULAK

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. CR. S-04-0218 MCE
	)	
Plaintiff,	)	
	)	STIPULATION AND <del>{PROPOSED}</del> ORDER
v.	)	
	)	
CARRIE MARIE SULAK, et al.	)	Date: August 30, 2005
	)	Time: 8:30 a.m.
Defendants.	)	Judge: Hon. Morrison C. England
	)	
_____	)	

It is hereby stipulated and agreed to between the United States of America through Phil Ferrari, Assistant U.S. Attorney; defendant, CARRIE MARIE SULAK, by and through her counsel, Dennis S. Waks, Supervising Assistant Federal Defender; and defendant, JOSEPH W. MCALLISTER, by and through his counsel, William J. Portanova, that the status conference of July 26, 2005 be vacated and a further status conference be set for August 30, 2005 at 8:30 a.m.

This continuance is being requested because the parties are negotiating a plea agreement and need time to reduce it to writing and provide it to the Court. Both Defense counsel need time to discuss the plea with the prosecutor and with the defendants.

1 Further, defense counsel, Rachelle Barbour, went out on maternity  
2 leave in June, and Supervising Assistant Federal Defender, Dennis S.  
3 Waks, took over this case and needs more time to review the file and  
4 familiarize himself with the case.

5 Speedy trial time is to be excluded from the date of this order  
6 through the date of the status conference set for August 30, 2005,  
7 pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv) and Local Code T4 based upon  
8 continuity of counsel and defense preparation.

9 Dated: July 22, 2005

Respectfully submitted,

QUIN DENVIR  
Federal Defender

/s/ Dennis S. Waks

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DENNIS S. WAKS  
Supervising Assistant Federal  
Defender  
Attorney for Defendant  
CARRIE MARIE SULAK

/s/ Dennis S. Waks for

\_\_\_\_\_  
WILLIAM J. PORTANOVA  
Attorney for Defendant  
JOSEPH W. MCALLISTER

1 Dated: July 22, 2005

2 MCGREGOR W. SCOTT  
3 United States Attorney


4 /s/ Dennis S. Waks for

5 PHIL FERRARI  
6 Assistant U.S. Attorney

7 O R D E R

8 IT IS SO ORDERED.

9 Dated: July 27, 2005

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11 MORRISON C. ENGLAND, JR  
12 UNITED STATES DISTRICT JUDGE  
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